

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re: ARC AIRBAGS INFLATORS  
PRODUCTS LIABILITY LITIGATION

ALL CASES

Case No.: 1:22-md-03051-ELR

MDL No. 3051

Judge Eleanor L. Ross

**UNOPPOSED MOTION FOR  
EXTENSION OF BRIEFING  
DEADLINES WITH RESPECT  
TO PLAINTIFFS' MOTION  
FOR JURISDICTIONAL  
DISCOVERY WITH  
RESPECT TO DEFENDANT  
ZF FRIEDRICHSHAFEN AG**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant ZF Friedrichshafen AG (“ZF Friedrichshafen”) respectfully requests that the Court (1) grant ZF Friedrichshafen a 15-day extension, through and including January 21, 2025, within which to file its response to Plaintiffs’ Motion for Jurisdictional Discovery with Respect to Defendant ZF Friedrichshafen AG (ECF No. 294) (the “Discovery Motion”); and (2) grant Plaintiffs a 7-day extension, through and including February 11, 2025, within which to file their Reply in Support of the Discovery Motion.

In support thereof, ZF Friedrichshafen states as follows:

1. Plaintiffs filed their Consolidated Class Action Complaint on June 28, 2023. ECF No. 94.

2. On November 4, 2024, ZF Friedrichshafen was served with the summons and Consolidated Class Action Complaint pursuant to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters. *See* ECF No. 279-1, at 1 n. 2.

3. ZF Friedrichshafen filed its Motion to Dismiss the Consolidated Class Action Complaint on November 25, 2024, based on a lack of personal jurisdiction. ECF No. 279.

4. On November 27, 2024, Plaintiffs filed an unopposed motion to extend their deadline to respond to ZF Friedrichshafen's Motion to Dismiss until December 23, 2024 (ECF No. 282), which the Court granted on December 3, 2024 (ECF No. 285).

5. Pursuant to the Court's December 3 Order, Plaintiffs responded to ZF Friedrichshafen's Motion to Dismiss on December 23, 2024. ECF No. 293.

6. Also, on December 23, 2024, Plaintiffs filed their Discovery Motion, requesting in the alternative that the Court grant leave to conduct jurisdictional discovery of ZF Friedrichshafen. ECF No. 294.

7. Pursuant to the Court's December 3 Order, ZF Friedrichshafen's Reply in Support of Its Motion to Dismiss is due on January 21, 2025. ECF No. 285.

8. Under Local Civil Rule 7.1, ZF Friedrichshafen's response to the Discovery Motion would be due on January 6, 2025, and Plaintiffs' Reply would be due fourteen (14) days later. *See* Loc. Civ. R. 7.1(B)-(C).

9. However, because Plaintiffs' Discovery Motion addresses subjects raised in ZF Friedrichshafen's Motion to Dismiss, ZF Friedrichshafen seeks to submit its response to the Discovery Motion concurrently with its Reply in Support of Its Motion to Dismiss. In turn, Plaintiffs have indicated that they seek a corresponding extension of the time to submit their Reply in Support of the Discovery Motion.

10. Counsel for ZF Friedrichshafen conferred with counsel for Plaintiffs before filing this motion. Counsel for Plaintiffs informed counsel for ZF Friedrichshafen that they do not oppose the relief sought in this motion.

11. This request is submitted in good faith and is not intended to cause undue delay, unnecessary burden, or needless expense.

Therefore, for good cause shown, ZF Friedrichshafen respectfully requests that the Court enter an Order (1) granting ZF Friedrichshafen a 15-day extension, through and including January 21, 2025, within which to file its response to the Discovery Motion; and (2) granting Plaintiffs a 7-day extension, through and including February 11, 2025, within which to file their Reply in Support of the Discovery Motion. A proposed order granting this relief is attached.

Dated: December 30, 2024

Respectfully submitted,

/s/ Arthur F. Foerster  
LATHAM & WATKINS LLP

Arthur F. Foerster  
Illinois Bar No. 6271201  
Sean M. Berkowitz  
Illinois Bar No. 6209701  
Johanna Spellman  
Illinois Bar No. 6293851  
330 North Wabash Street, Suite 2800  
Chicago, IL 60611  
Telephone: 312.876.7700  
Facsimile: 312.993.9767

Sean P. McNally  
Michigan Bar No. 66292  
Troutman Pepper Hamilton Sanders  
LLP  
4000 Town Center, Suite 1800  
Southfield, MI 48075  
Telephone: 248.359.7317  
Facsimile: 248.359.7700

Lindsey B. Mann  
Georgia Bar No. 431819  
Troutman Pepper Hamilton Sanders  
LLP  
600 Peachtree Street, Suite 3000  
Atlanta, GA 30308  
Telephone: 404.885.2743  
Facsimile: 404.962.6538

*Counsel for ZF Friedrichshafen AG*

**CERTIFICATE OF SERVICE**

On December 30, 2024, I hereby certify that I have caused a true and correct copy of the foregoing to be filed with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Arthur F. Foerster

Arthur F. Foerster